



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY, P.O. BOX 1401
DOVER, DELAWARE 19903

OFFICE OF THE
DIRECTOR

TELEPHONE: (302) 736-4860

ORIGINAL
(Red)

Mr. Len Mangiaracina, Deputy Director
Environmental Services Division (3ES00)
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

RECEIVED

MAR 25 1987

Hazardous Waste Management Division
EPA - Region III

Dear Mr. Mangiaracina:

The attached letter from Richard Boardman regarding the probable source of PCBs to the Red Clay Creek has come to my attention. I would like to take this opportunity to concur with Mr. Boardman regarding the need for immediate action to prevent further off-site migration of PCBs to the West Branch of the Red Clay Creek.

As we had noted at the February 13, 1987 interagency meeting concerning the Red Clay Creek, the Delaware Division of Fish and Wildlife has decided not to stock the creek this year due in part to the PCB problem. Since the February meeting, the Delaware DNREC and the Delaware Division of Public Health have taken an additional step by jointly issuing an advisory recommending the public not consume any fish taken from the Delaware portion of the creek. Designated uses have clearly been impacted.

All available evidence suggests that the primary source of the problem is PCB laden sediments from the swale adjacent to the NVF, Kennett Square property. Even in the event that other sources are identified as a result of NVF's and EPA's sampling, it would appear prudent to control the confirmed source immediately if possible.

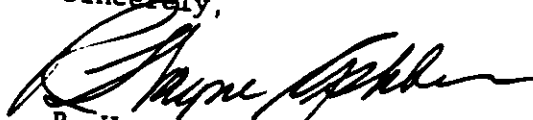
Mr. Boardman's letter states that the Consent Order between EPA and NVF does not address cleanup. Is this true and has EPA considered the feasibility of interim containment under a separate action? Does the timeframe for execution of activities identified in the Consent Order preclude the need for interim controls? What steps will be taken if samples taken from the swale confirm extensive PCB contamination? What about the PCBs which have already entered the creek? Please provide us with answers to these questions along with a copy of the Consent Order for our files. We ask to be kept abreast of key activities relative to the Consent Order. We also ask to be informed of developments in the Naznesky Junkyard investigation as well as other hazardous waste investigations in the Kennett Square area.

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In closing, I would like to reiterate Delaware's desire for prompt action on this problem. I recommend that you reconvene the core of the Regional Task Force to discuss this issue in greater detail if you feel it would be of benefit. We shall await your response.

Sincerely,



R. Wayne Ashbee
Director

Division of Water Resources

cc: ~~Roland Schrecongost, EPA, Region III~~
Richard Boardman, PADER, Harrisburg
Joseph Feola, PADER, Norristown
John E. Wilson, III
William Wagner
Robert J. Touhey

Attachment

AR100183



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL RESOURCES

ORIGINAL
(Red)

P.O. BOX 2063
HARRISBURG, PENNSYLVANIA 17120 March 6, 1987

Mr. Len Mangiaracina
Deputy Director of
Environmental Services Division
U. S. Environmental Protection Agency
3EFOO
Chestnut Building
Philadelphia, PA 19107

Dear Mr. *Len* Mangiaracina:

During the February 13, 1987 meeting held to discuss the toxic pollution of Red Clay Creek which you chaired, we learned that your agency was ready to issue a revised Consent Order (CO), to the National Vulcanized Fiber Corporation (NVF) which deleted any reference to clean-up. We understand this CO will only require additional site testing by NVF and off-site testing by EPA. The additional sampling by EPA will be conducted to determine if additional PCB sources exist, as claimed by NVF.

We feel we must point out that no data existing at present (including DER, NVF consultant Weston, and EPA's) support the theory of an additional PCB source. Our samples of the West Branch Red Clay Creek upstream of the NVF tributary have never indicated the presence of PCB's. Two positive PCB samples were found in soils from the Naznesky Junkyard. PCB concentrations in two areas of the junkyard were 490 and 910 ug/kg. Both these samples were obtained in areas not prone to storm run-off. When the junkyard soil samples are compared to tributary sediment samples below NVF's outfall 001 (PCB concentrations have been measured up to 400,000 ug/kg) it is evident that the primary source of PCB's was the NVF discharge.

We are therefore urging EPA to take immediate action to prevent any additional transport of PCB contaminated sediments from the tributary into the West Branch of Red Clay Creek. We believe that once contaminated the West Branch may never be cleaned-up. Protected uses of the West Branch have already been impacted. We have issued notices of the contaminated fishery and we understand that Delaware will no longer stock the stream.

We urge you to reconsider EPA's planned course of action.

Sincerely,

Richard M. Boardman
Director, Office of Environmental Management

cc: Mr. Gonshor
Mr. Feola
Re 30 7W58.5

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